

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION

CASE NO: 15-36520-KLP
CHAPTER 13

FILED
2016 MAR 14 AM 9:36
U.S. BANKRUPTCY COURT
RICHMOND DIVISION

In re
David G. Lambert
Brenda L. Lambert

Debtor(s),

ANDREW J. HOLICK
MOTION TO DISMISS OR RE-HEAR CERTIFICATION IN SUPPORT OF MOTION FOR
EXPEDITED HEARING

COMES NOW the creditor, Andrew J. Holick, and hereby serves its notice to
dismiss the CERTIFICATION IN SUPPORT OF MOTION FOR EXPEDITED HEARING
based on the following:

Mr. Krumbein failed to give proper notice of the hearing to this Creditor,
Andrew J Holick, and other creditors as required. Andrew J Holick, nor
any other creditors are listed on his Certificate of Service. I, Andrew J. Holick, certify
that I have not received by mail, by fax, or by process service, a copy of the Motion as
of March 13, 2016.

If not dismissed, this Creditor request a hearing to have the matter reheard at a
later date that is convenient for all parties.

This Creditor objects to item Number 1, as there was no reason for an
expedited hearing.

This Creditor objects to item Number 2 as there was no due diligence by Mr.
Krumbein to contact and attempt to resolve this matter before bringing it to the court.

This Creditor denies item Number 3 based on the fact, Mr. Krumbein, counsel
for Debtors, has made no bona fide effort to resolve this matter with this Creditor

without a hearing.

Brenda L. Lambert and David G. Lambert, and Pia North, original counsel for the Debtors, have my cell phone number that I have had for 10 years. I have had phone conversation with Pia North's office. I have received fax from Pia North's office and many mailings from her office as well. As of this day, March 13, 2016, I have not received by mail, by fax, or by process service, a copy of the Motion.

WHEREFORE, this Creditor respectfully requests this honorable Court to dismiss this case or schedule a time to have it reheard.



Pro Se

ANDREW J. HOLICK
8907 Royal Birkdale Drive
Chesterfield, VA 23832
(804) 350-5942

CERTIFICATE OF SERVICE

I CERTIFY that a copy has been furnished either by electronic or standard first class mail on March 14, 2016, to: David G. Lambert and Brenda L. Lambert, Debtor(s), 202 E. Brookland Park Blvd., Richmond, VA 23222; Jason M. Krumbein, Esq., Counsel for the Debtor(s) in Bankruptcy, Krumbein Consumer Legal Services, Inc., 5310 Markel Rd., Suite 102, Richmond, VA 23230; Suzanne E. Wade, Chapter 13 Trustee, PO Box 1780, Richmond, VA 23218-1780 Fax: (804) 775-0986.

Given under my hand this 14th day of March, 2016

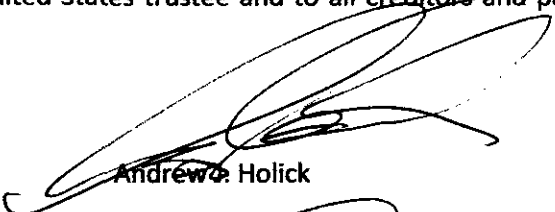


ANDREW J. HOLICK

Case No. 15-36520-KLP

CERTIFICATE OF SERVICE

I CERTIFY that on March 14, 2016, I have mailed a true copy of the foregoing documents by mail to the Debtor(s), Chapter 13 Trustee, the United States trustee and to all creditors and parties in interest of the mailing list attached hereto.



Andrew J. Holick

Given under my hand this 14th day of March, 2016.



Andrew J. Holick

David G. Lambert and
Brenda L. Lambert
202 E. Brookland Park Blvd.
Richmond, VA 23222

Suzanne E. Wade
Chapter 13 Trustee
PO Box 1780
Richmond, VA 23218-1780
Fax: (804)775-0986

Alfa Vision Insurance Co
PO Box 2328
Brentwood, TN 37024-2328

Avid Acceptance
PO Box 708580
Sandy, UT 84070-8580

Avid Acceptance, LLC
6995 Union Park Center
Midvale, UT 84047-6047

CJW Medical Center
Post Office Box 99008
Bedford, TX 76095-9108

City Auto
4000 Regent Blvd
Irving, TX 75063-2246

City of Richmond DPU Bank
Dept. of Public Utilities
730 E. Broad Street, 5th Floor
Richmond, VA 23219-1861

Comcast
5401 Staples Mill Road
Richmond, VA 23228-5443

Commonwealth Hospitalist Serv.
4050 Innslake Dr.
Suite 308
Glen Allen, VA 23060-3327

Consumer Portfolio Svc.
Attn: BANKRUPTCY
19500 Jamboree Rd.
Irvine, CA 92612-2401

Dominion Virginia Power
PO Box 26543
Richmond, VA 23290-0001

Focus Recovery Solutions
Attn: Bankruptcy
9701 Metropolitan Court, Suite B
Richmond, VA 23236

Fast Auto Loan
5218 West Broad St.
Richmond, VA 23230-3010

First Credit Corporation
PO Box 9300
Boulder, CO 80301-9300

First Credit Corporation
PO Box 9300
Boulder, CO 80301-9300

Henrico County Treasurer PP
PO Box 90775
Henrico, VA 23273-0775

Ntelos
PO Box 580423
Charlotte, NC 28258-0423

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Produce Source Partners
13167 Telecourt Rd
Ashland, VA 23005-7454

Solomon & Solomon, PC
5 Columbia Circle
Albany, NY 12203-6374

Jason M. Krumbein, Esq.
Krumbein Consumer Legal
Services, Inc.
1650 Willow Lawn Dr., Suite 201
Richmond, VA 23230

Chesterfield County Property Taxes
Richard A. Cordle, Treasurer
PO Box 26585
Richmond, VA 23261-6585

Commonwealth of VA – Tax
PO Box 2156
Richmond, VA 23218-2156

Consumer Portfolio Svc.
Attn: Bankruptcy
PO Box 57071
Irvine, CA 92619-7071

Henrico Doctors Hospital
PO Box 740760
Cincinnati, OH 45274-0760

HSBC Taxpayer Finance
90 Christiana Road
New Castle, DE 19720-3118

IC Systems, Inc.
PO Box 64378
St. Paul, MN 55164-0378

Internal Revenue Service
Centralized Insolvency Unit
PO Box 7346
Philadelphia, PA 19101-7346

Prestige Financial Svc
Attn: Bankruptcy
PO Box 26707
Salt Lake City, UT 84126-0707

Southwest Credit Systems
4120 International Parkway
Suite 110
Carrollton, TX 75007-1958

Verizon Wireless
PO Box 3397
Bloomington, IL 61702-3397

United States Bankruptcy Court
Eastern District of Virginia
701 East Broad Street
Richmond, VA 23219
Attn: Clerk of Court

B20A (Official Form 20A) (Notice of Motion or Objection) (12/10)

EDVA (12/10)

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA

David G. Lambert. Division
In re: Brenda L. Lambert.
[Set forth here all names including married, maiden, and
trade names used by debtor within last 8 years.]

Case No. 3:15-BK-36520-KLP

Debtor

Chapter 13

Address

202 E. BRICKMEAD BLVD.
RICHMOND VA 23222

Last four digits of Social Security or Individual Tax-payer
Identification (ITIN) No(s), (if any):

Employer's Tax Identification (EIN) No(s), (if any):

NOTICE OF MOTION (OR OBJECTION)

Andrew J. Halick has filed papers with the court to Dismiss or
Re-Hear Notice of Motion to Expedite ad. Certification
in Support of Motion for Expedited Hearing
Your rights may be affected. You should read these papers carefully and discuss
them with your attorney, if you have one in this bankruptcy case. (If you do not have an
attorney, you may wish to consult one.)

If you do not want the court to grant the relief sought in the motion (or objection), or if
you want the court to consider your views on the motion (or objection), then on or before
14 Day From Today or your attorney must:

- ☒ File with the court, at the address shown below, a written request for a hearing
[or a written response pursuant to Local Bankruptcy Rule 9013-1(H)]. If you mail
your request for hearing (or response) to the court for filing, you must mail it
early enough so the court will receive it on or before the date stated above.

Clerk of Court
United States Bankruptcy Court

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You must also mail a copy to:

- ☐ Attend a hearing to be scheduled at a later date. You will receive separate notice of hearing. **If no timely response has been filed opposing the relief requested, the court may grant the relief without holding a hearing**

☒ Attend the hearing on the motion (or objection) scheduled to be held on April 6, 2016 at 1030 A.m. at United States Bankruptcy Court, 701 E. Broad St. Beale
Judge Phillips Room 5100, Richmond VA 23219

If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the motion or objection and may enter an order granting that relief.

Date: 3-14-16

Signature, name, address and telephone number of person giving notice.

Pro Se
Andrew J. Halick
3907 Royal Birkdale Dr.
Chesterfield, VA 23832
Virginia State Bar No. _____
Counsel for _____

Certificate of Service

I hereby certify that I have this 14th day of March, 2016, mailed or hand-delivered a true copy of the foregoing Notice of Motion (or Objection) to the parties listed on the attached service list.

[Signature]